

1 SEVERA KEITH, SBN 218167
2 LAW OFFICES OF SEVERA KEITH
3 179 11th Street, Second Floor
4 San Francisco, CA 94103
(415) 626-6000 - Telephone
(415) 865-0376 - Facsimile

5 Attorney for Defendant
6 LATASHA RINGO

FILED

JAN 31 2013

RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND

7 **IN THE UNITED STATES DISTRICT COURT**
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9 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**
10 **OAKLAND DIVISION**

11
12 THE UNITED STATES OF AMERICA,
13
14 Plaintiff,

15 vs.

16 LATASHA RINGO,
17
18 Defendant.

No. CR12-00816 PJH

STIPULATION AND ~~PROPOSED~~
ORDER EXCLUDING TIME UNDER
THE SPEEDY TRIAL ACT AND
RESETTING STATUS HEARING

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21 IT IS HEREBY STIPULATED AND AGREED between the plaintiff through its
22 attorney, Michael Pitman, and the defendant through her attorney, Severa Keith, that
23 time be excluded from January 22, 2013 to February 20, 2013 for effective preparation of
24 counsel. As was stated in court on January 22, 2013, at defense counsel's appointment
25 in this case, after the Federal Public Defender was relieved due to a conflict, the defense
26 has received discovery from the government consisting of one DVD, and approximately
27 five hundred printed pages. Defense counsel requires additional time to review the
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Ringo: Stipulation to Exclude Time and Reset Status Hearing; ~~Proposed~~ Order

1 produced discovery and conduct necessary investigation. The parties agree that the
 2 delay is not attributable to lack of diligent preparation on the part of the attorney for the
 3 government or defense counsel. For these reasons, the parties request that time under
 4 the Speedy Trial Act be excluded based on the defense's need for reasonable time
 5 necessary for effective preparation, taking into account the exercise of due diligence.

6 For the same reasons, the parties agree to reset the Status Hearing scheduled on
 7 January 30, 2013 to February 20, 2013, at 2:30 p.m.

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 9 IT IS SO STIPULATED:

10 Dated: January 22, 2013

Respectfully Submitted,

/s/

Severa Keith CSBN: 218167
 Attorney for Defendant
 LATASHA RINGO
 179 11th Street, 2nd Floor
 San Francisco, CA 94103
 (415) 626-6000
 severakeith@gmail.com

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 17 Dated: January 22, 2013

/s/

Michael Pitman
 Assistant U.S. Attorney
 Office of The U.S. Attorney
 450 Golden Gate Avenue, Box 36055
 San Francisco, CA 94102
 (415) 436-6745
 Michael.pitman@usdoj.gov

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Ringo: Stipulation to Exclude Time and Reset Status Hearing; [Proposed] Order

ORDER

GOOD CAUSE HAVING BEEN SHOWN, the Court finds that failing to exclude the time between January 22, 2013 and February 20, 2013 would unreasonably deny the defense the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv). The Court further finds that the ends of justice served by excluding the time between January 22, 2013 and February 20, 2013 from computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a speedy trial. Therefore, it is hereby ordered that the time between January 22, 2013 and February 20, 2013 shall be excluded from computation under the Speedy Trial Act. 18 U.S.C. §§3161(h)(7)(A) and (B)(iv). It is also ordered, for the same reasons, that the Status Hearing set for January 30, 2013 be reset to February 20, 2013, at 2:30 p.m.

DATED: January 30, 2013


HONORABLE KANDIS A. WESTMORE
United States Magistrate Judge